

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
BDC Group Inc.,	Bankruptcy No. 23-00484
Debtor-in-Possession.	MOTION TO REJECT UNEXPIRED LEASE

COMES NOW the Debtor-in-Possession, BDC Group Inc., through its undersigned counsel, and hereby respectfully requests this Court authorize it to reject the lease it has with Soft Dig Properties, LLC, stating the following in support:

1. Debtor and Soft Dig Properties, LLC are parties to a lease agreement for Storage Unit S-15 at Independence Business Center, LLC, 11900 Livingston Road, Manassas, Virginia 20109.
2. Debtor believes that all the collateral and valuable property previously stored at the Manassas lot has been removed.
3. Since Debtor no longer has any valuable property being stored at Unit S-15 11900 Livingston Road, Debtor wishes to reject the lease under 11 U.S.C. § 365(a).
4. Under 11 U.S.C. § 554(a) Debtor wishes to abandon any property left at the lot as of no or little value to the estate. Debtor believes there is little or nothing left at that site.

WHEREFORE the Debtor-in-Possession respectfully requests this Court authorize it to reject the lease it has with Soft Dig Properties, LLC, as described above, and grant such other relief as is just and equitable given the circumstances.

Dated this 7th day of December, 2023.

Respectfully submitted,

AG & BUSINESS LEGAL STRATEGIES

/s/Austin Peiffer

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ATTORNEY FOR DEBTOR-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of December, 2023, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF system.

Soft Dig Properties, LLC
525 Milltown Rd
Ste 304
New Brunswick, NJ 08901

Soft Dig Properties, LLC
525 Milltown Road
Ste 304
North Brunswick, NJ 08901

Signed: /s/ Alex C. Tvedte